

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

KELLEY WOODRUFF, M.D., and HAWAII CHILDREN'S  
BLOOD AND CANCER GROUP,  
Plaintiffs,

Civil No. 02-1-0090-01 (BIA)  
vs.

HAWAI'I PACIFIC HEALTH; KAPI'OLANI MEDICAL  
SPECIALISTS; KAPI'OLANI MEDICAL CENTER FOR WOMEN AND  
CHILDREN; ROGER DRUE; FRANCES A. HALLONQUIST; NEAL  
WINN, M.D.; SHERREL HAMMAR, M.D.; DELOITTE & TOUCHE  
LLP; DENNIS M. WARREN, ESQ.; JOHN DOES 1-99; JANE  
DOES 1-99; DOE ENTITIES 1-20; AND DOE GOVERNMENTAL  
UNITS 1-10,  
Defendants.

DEPOSITION OF KELLEY ANN WOODRUFF, M.D.

VOLUME I

Taken on behalf of the Defendants Hawai'i  
Pacific Health, Kapi'olani Medical Specialists,  
Kapi'olani Medical Center for Women and Children,  
Roger Drue, Frances a. Hallonquist, Neal Winn, M.D.,  
and Sherrel Hammar, M.D., at the office of Robbins &  
Associates, 841 Bishop Street, Suite 2200, Honolulu,  
Hawaii 96813, commencing at 8:14 a.m., on October 6,  
2005, pursuant to Notice.

BEFORE: DENNIS J. YANKEE, CSR NO. 285

Certified Shorthand Reporter

EXHIBIT F

1 mind and decided not to resign, and at some point I  
2 did obtain new counsel.

08:56 3 Q. Okay. Are there any other facilities that  
4 we have not mentioned where, to your knowledge, you  
5 currently have privileges to practice medicine?  
6 You've mentioned you are on the staff at Kapi'olani  
7 Medical Center, correct?

08:57 8 A. That's correct.

08:57 9 Q. You're on the staff of St. Francis,  
10 correct?

08:57 11 A. Yes.

08:57 12 Q. You say you're credentialed by Kaiser but,  
13 to your knowledge, have no privileges there, correct?

08:57 14 MR. DEL CASTILLO: Well, I think that  
15 misstates her testimony, so I'm going to object to  
16 that. I don't think she said she didn't have  
17 privileges. She said she didn't understand whether  
18 she had privileges, based upon that credentialing.

08:57 19 BY MR. ROBBINS:

08:57 20 Q. Is that correct?

08:57 21 A. Yes.

08:57 22 Q. Are there any other facilities where you  
23 have privileges?

08:57 24 A. Yes.

08:57 25 Q. Where?

1 share profits in the business?

2 A. I don't know.

3 Q. Well, can you describe for us the mechanism  
4 by which you share profits with Doctor Wilkinson?

5 A. We have a business together, and we both  
6 bring in income into that business, and we share the  
7 profits of that business.

8 Q. What is the business?

9 A. What is its name?

10 Q. Yes.

11 A. Its name is Hawaii Children's Blood and  
12 Cancer Group.

13 Q. What is the nature of the business? By  
14 that I mean, as I understand it in reviewing your  
15 declarations, it is not a corporation, correct?

16 A. No, we are not incorporated.

17 Q. What type of a business entity is it, if  
18 it's not a corporation, what is it?

19 A. I guess I don't know.

20 Q. And what is the business of HCBCG, in other  
21 words, what kind of business does it conduct?

22 A. We treat patients who have hematology or  
23 oncology problems.

24 Q. And where physically is that practice, in  
25 other words, when you see your patients where do you

1 see those patients?

34 2 A. The vast majority of patients are seen at  
3 Kapi'olani Medical Center for Women and Children.

09:34 4 Q. At the PAU?

09:34 5 A. Outpatients are seen in the PAU.

09:34 6 Q. And the inpatients are seen if they're  
7 admitted to the Medical Center I guess, right?

09:35 8 A. Inpatient are seen in the inpatient wards.

09:35 9 Q. And on what basis do you share the profits,  
10 is it 50/50?

09:35 11 A. Yes.

09:35 12 Q. When did you and Doctor Wilkinson enter  
13 into this agreement with each other?

09:35 14 A. Our business started April 2002.

09:35 15 Q. And was that shortly after Doctor Wilkinson  
16 resigned his employment at KMS?

09:35 17 A. It's the day after.

09:35 18 Q. As far as Suite 1050 is concerned, have you  
19 signed any kind of lease as a tenant of that suite?

09:35 20 A. No.

09:35 21 Q. So, would it be correct to say that Doctor  
22 Wilkinson is the, as you understand it, the sole  
23 signatory on any lease for Suite 1050?

09:36 24 A. I don't know who the signatory on the lease  
25 is.

## C E R T I F I C A T E

STATE OF HAWAII )

) SS.

CITY AND COUNTY OF HONOLULU )

I, DENNIS J. YANKEE, do hereby certify;

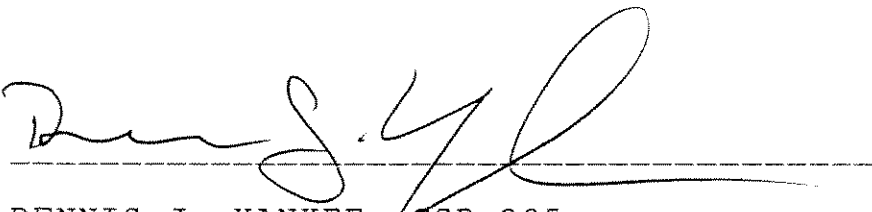
That on October 6, 2005, at 8:14 a.m.

appeared before me KELLEY ANN WOODRUFF, M.D., the  
witness whose deposition is contained herein; that  
prior to being examined she was by me duly sworn;

That the deposition was taken down by me in  
machine shorthand and was thereafter reduced to  
typewritten form under my supervision; that the  
foregoing represents to the best of my ability, a  
true and correct transcript of the proceedings had in  
the foregoing matter.

I further certify that I am not an attorney  
for any of the parties hereto, nor in any way  
concerned with the cause.

DATED this 13<sup>th</sup> day of October, 2005, in  
Honolulu, Hawaii.

  
DENNIS J. YANKEE, CSR 285